

UNITED STATES DISTRICT COURT
SECOND DISTRICT OF NEW YORK

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THOMAS HARTMAN,

Plaintiff,

04cv1784(CLP)

-against-

PLAINTIFF'S EXHIBITS

POLICE OFFICER KARL N. SNELDERS
and, POLICE OFFICER MICHAEL KNATZ,

Defendants.
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Plaintiff's Exhibits:

1. Nassau County Police Department Case Report, dated March 12, 2004, Bates stamped 001688-001690.
2. District Court Information, Menacing in the Third Degree, dated March 13, 2004, Bates stamped 001710.
3. Florio Supporting Deposition, dated March 12, 2004, Bates stamped 001694.
4. Simplified Traffic Information, Reckless Driving, LI 683845 1 (03/12/04), bates stamped as 1712.
5. Police Officer Karl Snelders - Notes - (03/12/04).
6. Crime Scene photos, report and diagram prepared by detective Robert Giovannettone, subject to redaction.
7. Affidavit of expert George Ruotolo, sworn May 23, 2006.
8. Report of Lone Thanning, M.D., dated August 7, 2006.

9. Report of Timothy Sheahan, sworn to August 30, 2006, including attachments and transcripts of police radio and other communications.
10. Testimony Exhibits and calculations made by Richard S. Hermance.
11. The motor vehicle impound work sheet dated March 12, 2004.
12. The Nassau County Police Department Property Bureau invoice dated March 13, 2004.
13. The Nassau County Police Department audio tapes from the radio transmission between 4:00 p.m. and 6:00 p.m. on March 12, 2004.
14. The Mason Tender's District Council of Greater New York master independent collective bargaining agreements pertaining to the periods 1999 through 2009.
15. The records of Mason Tender's District County Trust Funds, including computer generated hours work history.
16. The records of Mason Tender's District County Trust Funds, computer generated annuity fund account inquiry.
17. The records of Mason Tender's District County Trust Funds,, annuity fund detail inquiry.
18. The records of Mason Tender's District County Trust Funds, annuity fund payment history.
19. The plaintiff's income tax returns for the years 1999 through 2008, including related pay stubs and W-2's.

20. Copies of the pleadings, motions, orders, transcripts and other filings in the matter of Hall v. Snelders, Eastern District, docket number 97-cv 01349.
21. Copies of the pleadings, motions, orders, transcripts and other filings in the matter of Frazier v. County of Nassau, Docket number 04-cv-03248.
22. Copies of the pleadings, motions, orders, transcripts and other filings in the matter of Paphis v. County of Nassau, Index number 023129/1994.
23. Copies of the Ambulance Call Reports dated March 12, 2004.
24. The Nassau County Police Department “Laws of Arrest” guide line numbers 324, 325 and related Nassau County Police Department Academy less plan.
25. The Nassau County Police Department procedure manuals Dup. Bates stamped 2055 through 2144, and Dup. Bates stamped 2074-2095.
26. The Nassau County Police Department Use of Force lesson plans and/or Training Bulletins Dup. Bates stamped 2096 through 2138.
27. The Nassau County Police Department manual Article 6, Rule 5 Dup. Bates stamped 2146 through 2149, and Dup. Bates stamped 2055 through 2059.
28. The defendants’ response to plaintiff’s Demand for Discovery and Inspection dated July 20, 2006.

29. The Nassau County Police Department procedures manual concerning "Laws of Arrest" guide numbers 324 and 325, including documents **Dup.** Bates stamped 2060 through 2066.
30. The Nassau County Police Department Rules and Regulations Article 19 and Commissioner's Order number 76, including **Dup.** Bates stamped 2067 through 2083.
31. Nassau County Detectives Division General Orders 47 through 81, Hand Out number 447 and Swift Justice Manual, including document **Dup.** Bates stamped 2084 through 2243.
32. Nassau County Police Academy lesson plans, including document **Dup.** Bates stamped 2244 through 2258.
33. Nassau County Police Department OPS 8115 and 2115, including document **Dup.** Bates stamped 2259 through 2269.
34. Nassau County Police Department Use of Force Rules, Article 6, Rule 39, Article 17, Rule 1, Article 5, Rule 16, including documents Bates stamped 2270 through 2272.
35. Nassau County Police Department procedure OPS 6460 Article 6, Rule 5 and teletype order 245-87, including Bates stamped documents 2273 through 2278.
36. Nassau County Police Department Rule 4, Article 17, including documents Bates stamped 2279 through 2282.
37. Nassau County Police Department Article 8, Rules 11 through 15, including documents Bates stamped 2283 through 2284.

38. Nassau County Police Department Arrest Procedure 01.428.01 and hand out number 428, including Bates stamped 2285 through 2291.
39. Blotter Entry for the 7th Squad for March 12, 2004, including documents Bates stamped 2292 through 2294.
40. The defendants' response to plaintiff's Demand for Discovery and Inspection dated September 13, 2006.
41. Nassau County Police Department Laws of Arrest Guide 324 and 325 and related Academy Lesson Plan, including documents Bates stamped 1988 through 2054.
42. Nassau County Police Department Procedure Manual sections Bates stamped 2055 through 2144 (See Exhibit 25).
43. Nassau County Police Department Training Manual and procedures and lesson plans Bates stamped 2074 through 2095 (See Exhibit 25).
44. Nassau County Police Department Use of Force Training Bulletin 543 through 544 and 51, including documents Bates stamped 2096 through 2138. (See Exhibit 26).
45. Videotapes: ABC News Deadly Physical Force, Videotape 1204; Civil Liability and the Use of Force.
46. Nassau County Police Department Manual Article 6, Rule 5, including Bates stamped 2146 through 2149 (See Exhibit 27).
47. Nassau County Police Department Operation Order 8110, including documents Bates stamped 2055 through 2059.

48. The defendants' response to plaintiff's Discovery Demand dated July 20, 2006.
49. The disciplinary records, internal affairs records and civil complaints pertaining to Karl Snelders and Michael Knatz, including documents Bates stamped 341 through 1445.
50. The personnel files for defendants Karl Snelders and Michael Knatz, including documents Bates stamped 1446 through 1678.
51. Nassau County Police Department Rules for Disciplinary Action, including documents Bates stamped 1679 through 1680A.
52. Nassau County Police Department Procedures and Rules regarding arrest, vehicle pursuit, and use of force, including documents Bates stamped 1752 through 1768.
53. Nassau County Police Department Police officer material regarding use of force and arrest procedures Bates stamped 1769 through 1982.
54. Defendants' Supplemental Response to plaintiff's Demand for Discovery and Inspection dated April 15, 2005.
55. Copy of documents contained in the file of Richard S. Hermance as provided under the cover letter from defendants' attorneys dated August 10, 2006.
56. Exhibits marked from the deposition of Michael Knatz taken on May 25, 2005.

57. Copy of the report dated July 13, 2004, concerning the defendants' Notice of Claim investigation.
58. Nassau County Police Department MDT Message Log for March 12, 2004, including Bates stamped documents 63 through 66.
59. Sixty-nine color photographs depicting the plaintiff in or about August, 2005.
60. Copy of the records, studies, bills, films of Mark Goldberg, prosthetist.
61. Medical records, reports, chart, bills, radiological studies and films from the care and treatment at Nassau University Medical Center examinations conducted of the plaintiff, from May 12, 2004 and thereafter.
62. Copy of office notes, bill, records, reports, films and studies of Aric Hauknecht, M.D.
63. The report(s) and notes of Alan M. Leiken, Ph.D., dated April 22, 2006, August 5, 2006.
64. The report(s), notes, testing, and findings of Richard Schuster, Ph.D.
65. The report of George L. Ruotolo, dated September 21, 2005 and the accompanying exhibits and related deposition testimony.
66. The report of Lone Thanning, M.D., dated August 7, 2006, and the exhibits annexed thereto.
67. Defendants' Response to Plaintiff's First Set of Interrogatories.

68. Defendants' Supplemental Response to Plaintiff's First Set of Interrogatories.
69. The defendants' response to the Plaintiff's Second Set of Interrogatories
70. MRI reports and films from Gramercy MRI and Diagnostic Radiology, P.C. for the studies of the plaintiff's thoracic and lumbosacral spine (see Exhibit 62).
71. Anatomical drawings and models depicting and/or representing the areas of the plaintiff's injuries.
72. Copies of the records, notes, bills, reports and findings from the Lawrence Hospital Center for treatment rendered to the plaintiff.
73. Copies of the records, notes, bills, reports and findings from Complete Medical Care Services of New York, P.C. (see Exhibit 62).
74. Employment, time, wage and related records from the plaintiff's employers including Best Demolition, Ibex Construction, and Hennigan Construction.
75. Copies of the records, notes, bills, reports and findings from Joseph D'Angelo, M.D.
76. Copies of the records, notes, bills, reports and findings from Richard Schuster, Ph.D.
77. Copies of the records, notes, bills, reports and findings from Patrick McMahon, MD.

78. Copies of the records, notes, bills, reports and findings from Lawrence Hospital.
79. Copies of the records, notes, bills, reports and findings from Peak Performance Physical Therapy.
80. Copies of the records, notes, bills, reports and findings from Long Beach Hospital in November, 2006.

Dated: New York, New York
January 25, 2010

Daniel J. Hansen, Esq. (DJH:0211)
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